



United States Department of the Interior

FISH AND WILDLIFE SERVICE
San Francisco Bay National Wildlife Refuge Complex
P.O. Box 524
Newark, California 94560-0524
(510) 792-0222

Attachment

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SAN FRANCISCO BAY CONSERVATION
& DEVELOPMENT COMMISSION

September 18, 2001

Mr. Charles Jany
Redwood City Planning & Redevelopment Services
P.O. Box 391
Redwood City, California 94064-0391

Dear Mr. Jany:

This letter is written in response to the Notice of Negative Declaration and Use Permit for Mark Sanders' proposed marina to be located at Westpoint Slough in Redwood City. The marina is proposed to be built across from Greco Island, a significant wildlife area on the Don Edwards San Francisco Bay National Wildlife Refuge (Refuge). Our comments are intended to address issues directly affecting the Refuge and the wildlife we are mandated to protect. Additional comments addressing issues under the Fish and Wildlife Coordination Act, Clean Water Act, or Endangered Species Act may be sent under separate cover by the U.S. Fish and Wildlife Service's Sacramento Field Office.

The Refuge appreciates the effort Mr. Sanders and the City have made to reduce impacts from the proposed project. While we support many of the recommended mitigation elements found in the draft Biological Resources Report dated June 25, 2001, we have remaining concerns with the project. We hope these concerns can be addressed so the marina can proceed in a way that would protect the Refuge and its sensitive wildlife habitat.

The Refuge's Greco Island is approximately 500 feet across Westpoint Slough from the project site. The island is one of the most valuable remaining salt water marshes in South San Francisco Bay. In part because of its isolation from human disturbance, the island is one of the few remaining strongholds for the endangered California Clapper Rail and Salt Marsh Harvest Mouse as well as a great diversity of other wildlife. The marina project site itself contains excellent salt marsh habitat on the outboard side of the current salt pond levee on the Slough. This marsh has high potential to also provide habitat for these endangered species. On recent visits to the project site, we have observed large numbers of resting shorebirds using the old bittern pond where the marina will be built and have even observed feeding behavior in the pond.

We are concerned that the marina will 1) increase human presence in Westpoint Slough and disturbance on the Refuge's Greco Island and the project's site's tidal marsh, 2) increase erosion of wildlife habitat from boat wakes, 3) increase predator impacts on wildlife, 4) increase the distribution of exotic cordgrass, 5) increase contaminants, and 6) the shorebird roosting and feeding areas on the project site and the Westpoint Slough mud flats will not be sufficiently mitigated.

We support the proposal for buoys to be installed down the centerline of Westpoint Slough channel to discourage boats from deviating out of the channel. While this will help keep the larger boats from encroaching on Greco Island and the salt marsh habitat, it may still result in an unacceptable impact on the endangered species because smaller vessels will still be able to access the island. We recommend that the Marina install and maintain a buoy system 100 feet from the salt marsh in Westpoint Slough with signs stating that the marsh is closed to all public access. We support the installation of interpretative signs at the ramp to educate the public about the sensitive nature of wildlife in the area and to inform them that public access into marshlands of the Refuge is prohibited. At no time should individuals get out of their water craft and walk around the marshland, on berms or levees, or on boardwalks (PG&E does not allow public access to boardwalks). We recommend that the contractor coordinate with the Refuge on the information signs as they are developed.

We also recommend that no public access be allowed on the portion of the levee on the project site that is adjacent to the salt marsh. If that is not possible, we recommend that a physical barrier such as a low fence be built and maintained along the slough side of the proposed levee to prevent the public and their pets from accessing the sensitive salt marsh and mud flat habitat. Appropriate signage explaining the reason for closing this area to the public would also be helpful.

We recommend that the City establish and enforce a no wake zone in all of Westpoint Slough. Personal water craft should be prohibited from launching from the marina. We also recommend the City prohibit overnight mooring in the Slough.

We support the proposed mitigation measures to reduce roosting and nesting avian predators, to reduce construction disturbance and noise, and to reduce light and glare impacts to the Refuge and wildlife. The number of trees and other potential roosting and nesting structures installed in the development should be minimized and placed well back from the tidal areas. Plantings should incorporate low-growing native vegetation or non-invasive exotic vegetation, such as small shrubs, forbs, and grasses whenever possible, instead of trees. The marina's salt marsh is reported to contain exotic cordgrass, a species which is rapidly spreading in South San Francisco Bay. If this plant is allowed to expand in the area, it could degrade the quality of habitat for the endangered species in the Refuge and other marshes along Westpoint Slough. A management plan and funding should be established for an ongoing exotic cordgrass (*Spartina* spp.) control programs. When the marina is opened to tidal action, seeds from nearby exotic cordgrass plants will invade. If not controlled, exotic cordgrass will take over mudflat areas, causing rapid sedimentation which will necessitate frequent dredging as well as degrade wildlife habitat.

Because of the predictable increase in the mammal predator population that comes from human

development and the increase on the predation on the sensitive wildlife next to the marina, we recommend that an active predator trapping program be required for the life of the project. No feral cat feeding areas should be allowed at the project site with appropriate signs posted in public areas. Pets should be restricted to buildings and boats only and not allowed to roam outdoors. These rules should be strictly enforced. This restriction should be part of any lease/rental/use agreement for tenants of the development and marina. The Refuge can assist the Marina in the design of this program.

Because rip-rap may increase denning opportunities for rats, foxes and cats, we recommend that alternatives to the use of rip rap be investigated. If possible, create a more gradual slope (4-5H:1V) and plant native vegetation on newly graded areas to provide transitional habitat for high tide refugia for endangered species. If rip rap is necessary, it should consist of small materials that will not create habitat for rodents. Rip rap should not be placed on existing marsh vegetation.

Increased litter and garbage will attract and provide supplemental food for rats, cats, opossums, raccoons, and foxes which prey on clapper rails, salt marsh harvest mice, and other wildlife. The large amount of garbage produced by the restaurant and live aboards could be especially problematic. All dumpsters and garbage cans should be wildlife-proof to prevent scavenging by animals. Garbage should be removed on a regular basis to prevent overflow. Public areas should be monitored regularly and be kept free of garbage to prevent wildlife from scavenging.

We are concerned that fuel spills, sewage leaks, and storm water runoff would increase contaminant loads in the adjacent sloughs and could affect endangered species and other wildlife. The marina should develop a "Hazardous Materials Cleanup Plan" and participate in the "Oil Spill Prevention and Response" program managed by the California Department of Fish and Game. The marina should install proper containment berms and equipment for fuel storage. Only boats with efficient 4-cycle motors should be allowed to utilize the marina. Sewage releases from boats in the marina should be prohibited. A storm water management plan should be developed to prevent the marina's storm water from contaminating the adjacent sloughs and Refuge.

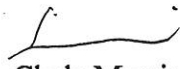
Though we do not anticipate a significant unmitigatable impact from dredging a channel from the entrance to the marina and the deeper Westpoint Slough channel, we are concerned that increased tidal flows from dredging/opening the marina acreage could cause erosion at Greco Island and the project site's salt marshes. We also believe any future maintenance dredging of the Westpoint Slough channel would have serious impact on the Refuge and wildlife at Greco Island. We recommend a requirement that no dredging be allowed in Westpoint Slough in the future except the Port of Redwood City's historic dredging of the bar at the entrance of the Slough to Redwood Creek. We suggest that potential erosion impacts from the proposed dredging of the entrance to the marina and increased tidal flow be evaluated and eliminated. We recommend that the Marina offset any unavoidable permanent loss of mudflat and marsh habitat which will result from the dredging project and tidal flow increase. These mudflats are frequently used by feeding shorebirds and as we have stated previously, the marsh provide habitat for endangered species in addition to a variety of other wildlife.

We support the recommended creation of approximately 3 acres of shorebird roost habitat to

offset the loss of the shorebird habitat in the bittern pond. We question if the proposed mitigation in the adjacent Cargill pond will result in long-term protection and will mitigate the loss of the feeding habitat we recently observed. Cargill has ended its salt production process at its Redwood City plant. The long-term use of this pond and the surrounding ponds is unknown. We recommend the mitigation be adjusted to provide both roosting and feeding habitat for shorebirds and the mitigation site be guaranteed to be protected from impacts from development of the surrounding land.

We believe that the requirement to implement all the mitigation measures recommended in the draft biological Resources Report and the additional measures described in this letter will result in a marina development that would conserve the Refuge's resources and the wildlife we are dedicated to protect. Thank you for the opportunity to comments on this document. If you have any questions regarding these comments, please contact me at (510) 792-0222.

Sincerely,



Clyde Morris
Refuge Manager
Don Edwards San Francisco Bay NWR

cc: Dan Buford & Mark Littlefield, FWS-ES, Sacramento, CA